

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

ICE MILLER LLP

Louis T. DeLucia
Alyson M. Fiedler
1500 Broadway, Suite 2900
New York, NY 10036
Phone: (212) 835-6312
louis.delucia@icemiller.com
alyson.fiedler@icemiller.com

Aneca E. Lasley (admitted pro hac vice)
John C. Cannizzaro (admitted pro hac vice)
250 West Street, Suite 700
Columbus, Ohio 43215
Phone: (614) 462-1085
aneca.lasley@icemiller.com
john.cannizzaro@icemiller.com

*Counsel to AIRN Liquidation Trust Co., LLC,
in its capacity as Liquidation Trustee of the
AIRN Liquidation Trust.*

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No: 22-14539-JKS

(Jointly Administered)

AIRN LIQUIDATION TRUST CO., LLC, in
its capacity as Liquidation Trustee of the
AIRN LIQUIDATION TRUST,

Plaintiff,

v.

MEDIA EFFECTIVE LLC, *et al.*,

Defendants.

Adv. Pro. No. 23-1335-JKS

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>.

JOINT STIPULATION REGARDING LIQUIDATION TRUSTEE'S APPLICATION FOR AN ORDER TO SHOW CAUSE FOR CONTEMPT VIOLATION OF TEMPORARY RESTRAINING ORDER AND MOTION OF DEFENDANTS JAVIER TORRES, MEDIA EFFECTIVE, LLC, DORA DILLMAN, JAVIER TORRES, JR., NATALIA TORRES, AND PAULINA TORRES TO DECLARE THE TEMPORARY RESTRAINING ORDER DATED NOVEMBER 22, 2023 DISSOLVED

This matter came before the Court on January 18, 2024 for an emergency hearing on the Liquidation Trustee's Application for contempt Violation of Temporary Restraining Order (Dkt. 19) and Motion of Defendants Javier Torres, Media Effective, LLC, Dora Dillman, Javier Torres, Jr., Natalia Torres, and Paulina Torres to Declare the Temporary Restraining Order Dated November 22, 2023 Dissolved (Dkt. 22).

On agreement and stipulation of the parties, each by and through their undersigned counsel, respectfully stipulate as follows:

1. The Court will hold a preliminary injunction hearing on **April 10, 2024, beginning at 10:00 a.m.** (the "Preliminary Injunction Hearing"). The Temporary Restraining Order entered on November 22, 2023 (Dkt. No. 9) shall remain in full force and effect until the conclusion of the Preliminary Injunction Hearing and entry of an order on the Liquidation Trustee's application for a preliminary injunction. On or by **April 4, 2024, at 12:00 p.m.** the parties shall deliver two binders each to the Court of all declarations, exhibits, and a statement of undisputed facts for use at the Preliminary Injunction Hearing.
2. Prior to the Preliminary Injunction Hearing, the parties shall engage in the following discovery:
 - a. Upon representation by counsel for Torres² that Torres no longer has access to his TD Bank account statements, counsel for the Liquidation Trustee agreed to, and did, produce by **January 19, 2024**, the TD Bank account statements it has received through third party discovery for the following accounts:

- i. TD Bank x1798
 - ii. TD Bank x1146
 - iii. TD Bank x5197
 - iv. TD Bank x 7317;
- b. By **February 2, 2024**, the Defendants shall, and did, produce all financial information, documents and statements, to the extent available, reflecting (1) all funds, property or assets received by any Defendant from or for the benefit of one or more of the Debtors (the “Debtor Transfers”), and (2) all transfers directly or indirectly by or from any Defendant to other persons or entities (including any other Defendant) of such Debtor Transfers to such other person or entity, as a direct transferee or as subsequent transferee. Notwithstanding the foregoing, Defendants are not obligated to produce financial documents and statements for direct or indirect transfers of individual specific transfer amounts less than \$5,000.00 from Javier Torres or Media Effective to one of the other individual Defendants;
- c. By **January 31, 2024**, the Liquidation Trustee shall, and did, convene and hold the Rule 26(f) Conference;
- d. By **March 14, 2024**, the Liquidation Trustee shall answer or otherwise respond to Defendants’ outstanding discovery served on December 27, 2023;
- e. By **January 31, 2024**, the Liquidation Trustee shall, and did, serve its written discovery on the Defendants, which Defendants shall answer or otherwise respond to by **March 27, 2024**; and

- f. Following the production of documents, the parties shall cooperate in scheduling any depositions to be conducted prior to the Preliminary Injunction Hearing, including, without limitation, the depositions of Javier Torres, Glenn A. La Mattina and William Waldie of Alvarez & Marsal. The parties further agree to produce Javier Torres and William Waldie for deposition pursuant to notice.
3. The Liquidation Trustee's oral motion to amend its Complaint is GRANTED solely to correct the identity of the Seventh-day Adventist Conference and church and the allegations related to the same in the Lawsuit. The Liquidation Trustee shall, and did, file its Amended Complaint no later than **January 26, 2024**.

[Signature Page to Follow]

Dated: February 22, 2024

Stipulated and agreed to by:

/s/ Louis T. DeLucia

Louis. T. DeLucia, Esq.
Alyson M. Fiedler, Esq.
ICE MILLER LLP
1500 Broadway, Suite 2900
New York, NY 10036
Phone: (212) 835-6312
louis.delucia@icemiller.com
alyson.fiedler@icemiller.com

Aneca E. Lasley (admitted pro hac vice)
John C. Cannizzaro (admitted pro hac vice)
ICE MILLER LLP
250 West Street, Suite 700
Columbus, Ohio 43215
Phone: (614) 462-1085
aneca.lasley@icemiller.com
john.cannizzaro@icemiller.com

*Counsel to Plaintiff AIRN Liquidation
Trust Co., LLC, in its capacity as
Liquidation Trustee of the AIRN
LIQUIDATION TRUST*

/s/ Edmond M. George

Edmond M. George, Esq.
Michael D. Vagnoni, Esq. (admitted pro hac vice)
OBERMAYER REBMANN MAXWELL &
HIPPEL LLP
1120 Route 73, Suite 420
Mount Laurel, NJ 08054-5108
Telephone: (856) 795-3300
Facsimile: (856) 482-0504
E-mail: edmond.george@obermayer.com

*Counsel to Defendants, Javier Torres, Media
Effective, LLC, Dora Dillman, Javier Torres, Jr.,
Natalia Torres, and Paulina Torres*